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March 14, 2022

By ECF

Hon. Valerie E. Caproni
United States District Court
Southern District of New York
Thurgood Marshall Courthouse
40 Foley Square
New York, New York 10007

Re: *Michael Kane, et al. v. Bill de Blasio, et al.* 21-cv-7863 (VEC)
Matthew Keil, et al. v. The City of New York, et al. 21-cv-8773 (VEC)

Dear Judge Caproni:

We represent the Plaintiffs in the above-referenced cases. We write to respectfully request an extension of time for the Plaintiffs to file their opposition to the Defendants' motion to dismiss the Amended Complaint, which is currently due on March 16, 2022. Attorney Barry Black, counsel for the *Keil* Plaintiffs, had an unexpected family emergency today. Plaintiffs require additional time to file their opposition.

This is the Plaintiffs' first request for an extension of time. Assistant Corporation Counsel Jessica Giambrone has consented to our request on behalf of the Defendants. We respectfully ask the Court to extend the time for the Plaintiffs to submit their opposition to Wednesday, March 30, 2022 and Defendants' reply papers, if any, to Friday, April 15, 2022.

We thank the Court for its attention to this matter.

Respectfully submitted,

/s/ Sujata S. Gibson
Counsel for Plaintiffs

/s/ Barry Black
Counsel for Plaintiffs

cc: Counsel of Record (via ECF)